ELTON 2 QUARRY WASTE PROCESSING & STORAGE ENVIRONMENTAL PERMIT APPLICATION

Non Technical Summary

Prepared for: Ingrebourne Valley Limited

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1.0 Introduction

Ingrebourne Valley Limited (IV) has instructed SLR Consulting Ltd (SLR) to prepare an application for an Environmental Permit for the inert waste processing and storage facility (the facility) associated with the proposed restoration of Elton 2 Quarry, located near Warmington, Northamptonshire.

Environment Agency (EA) application forms require the submission of a Non-Technical Summary (NTS) which includes an explanation of what is being applied for, a summary of the regulated facility and a summary of the key technical standards and control measures. This report comprises the NTS for the application.

In addition to this NTS, the Environmental Permit application includes the following documents:

- Application Forms Part A, Part B2, Part B4 and Part F1;
- Drawings;
- Environmental Risk Assessment (ERA);
- Operating Techniques (OT);
- Site Condition Report (SCR); and
- Dust Management Plan (DMP).

Whilst noise impacts have been considered in the ERA, a separate noise impact assessment has not been submitted with the application as it is considered that the risk of any impact is low due to the distance to the nearest sensitive receptor.

1.1 Site Location and Setting

The area to be occupied by the proposed facility is approximately 10 hectares in size and is located to the north of the village of Warmington and to the west of Elton at National Grid Reference TL 08175 92245. The A605 lies adjacent to the southern boundary of the site, from which the site is accessed via a road leading to the north-eastern corner of the processing area. A track runs adjacent to the northern boundary beyond which lie agricultural fields. The river Nene runs to the west and north of the facility and the existing Elton 1 site, now restored to an agricultural reservoir which lies to the west. Beyond Elton 1 lies the proposed Elton 2 Quarry which will be served by the proposed waste treatment facility.

The proposed facility will occupy the existing plant and processing area which was used for the processing and restoration of the Elton 1 site. The area also includes silt settlement lagoons associated with mineral washing during the extractive phase of Elton 2, which will be separately permitted as a mining waste operation.

The site location is shown in Drawing 01 and the Environmental Setting of the site is illustrated on Drawing 03.

1.2 Pre-application Advice

A pre-application meeting with the EA was held on 30th May 2019. Enhanced pre-application advice was received from the EA on 2nd October 2019 and is enclosed in Appendix 01 of this application. The pre-application advice did not specify requirements for any site specific emissions management plans.

1.3 Application Fees

The application charge for an inert waste treatment and storage facility is £7,930 (Table 1.16.12 Physical Treatment of Non-hazardous Waste).

The fee for assessment of the Dust Management Plan is £1,241 (Table 1.19.5 Emissions management plan (except where the application activity is a farming installation)).

The total application fees are therefore £9,171.

2.0 Proposed Development

The site will be used for the processing and storage of inert waste before it is transferred to Elton 2 Quarry for restoration purposes.

Treatment will consist of crushing and screening of inert waste materials to ensure that they are of a suitable size for the quarry restoration and to remove any non-conforming material.

The annual treatment capacity is estimated to be 135,000 tonnes per annum. It is anticipated that restoration of the quarry will be carried out for 9 months of each year in order to avoid the wetter winter months. It is therefore proposed that up to 30,000m^3 (54,000 tonnes) of material would be stockpiled at any one time. This is in order to provide the operational flexibility required to meet the restoration timescales required by the planning permission for the development.

2.1 Specified Waste Management Activities

The application is for a waste operation consisting of Physical Treatment of Non-hazardous Waste. The waste management activities that will be carried out at the site, under the conditions of the permit, as specified in Annex I of the Waste Framework Directive are:

- R5: Recycling / reclamation of inorganic compounds.
- R13: Storage of waste pending any of the operations numbered R5 and R10.

3.0 Key Technical Standards and Control Measures

3.1 Technical Standards

Key technical standards laid out in the following documents will govern the operation of the site:

- The Environmental Permitting (England and Wales) Regulations 2016;
- Risk Assessments for your environmental permit; gov.uk, updated 10 December 2020;
- Risk Assessments for specific activities: environmental permits; gov.uk, published 2 February 2016; and
- Develop a management system: environmental permits; gov.uk, updated 30 November 2020.

The key technical standards and control measures that are necessary to ensure that the site does not give rise to significant environmental impact have been determined through the risk assessment process and are summarised below:

- strict waste acceptance procedures will be implemented to prevent the acceptance of unauthorised waste;
- noise impacts will be minimised by speed limits and traffic calming, maintenance of road surfaces, selection and maintenance of plant to minimise noise and daily auditory inspections;
- operations will only be undertaken during the hours authorised by the planning consent;

- measures will be implemented to control fugitive emissions of dust through the site specific Dust Management Plan, which includes the use of water bowsers to damp down and minimise the emission of dust from the site;
- hard surfaces or paving will be used for haul routes. Speed limits of 10mph or less for roads will be implemented;
- wet cleaning methods or mechanical road sweepers will be used on all roads during periods when blown dust arisings are visible; and
- a comprehensive programme of operational monitoring will be implemented to include noise, fugitive emissions, mud and litter.

3.2 Management System & Operating Techniques

The site will be managed and operated in accordance with IV's Environmental Management System (EMS) which is accredited to ISO14001.

IV's management system will ensure that:

- the risks that the activities pose to the environment are identified;
- the measures that are required to minimise the risks are identified;
- the activities are managed in accordance with the management system;
- performance against the management system is audited at regular intervals; and
- the environmental permit is complied with.

A summary of the management system and operating techniques is enclosed in the Operating Techniques (OT) in Section 5 of this application. The OT describes the appropriate measures for the control of emissions that will be in place during operation of the site.

3.3 Waste Acceptance

The site will only accept inert waste. A full list of the proposed waste types for disposal and recovery (restoration and engineering) including the European Waste Catalogue (EWC) codes can be found in Appendix B4_1 to the application forms in Section 2 of the application.

Strict waste acceptance procedures will be in place at the site to ensure that non inert waste is not accepted at the site. These procedures include the following:

- Pre-acceptance checks prior to accepting waste at the Site, including source checking of the waste characterisation data provided by the waste producer;
- Waste acceptance checks upon delivery to site to ensure that the wastes are as described, and as permitted within the Environmental Permit; and
- Actions to be taken if waste not permitted by the Environmental Permit is delivered to site.

3.4 Environmental Risk Assessment

An Environmental Risk Assessment (ERA) has been undertaken to assess the potential impacts from the proposed operations. The following impacts have been identified as relevant to the operations and are included in the risk assessment:

- Odour;

- Noise & Vibration;
- Dust;
- Fugitive emissions including surface water run-off, Pests, Litter & mud; and
- Accidents.

The Environmental Risk Assessment has been undertaken in accordance with the EA's guidance 'Risk Assessments for your environmental permit' published on Gov.uk and updated 18 February 2020. The ERA lists the potential receptors that may be affected by the operations, details the source – pathway – receptor linkages and summarises the measures in place to mitigate risks. The ERA concludes that with the implementation of risk management measures potential impacts from the proposed development are not likely to be significant.

The ERA is enclosed as Section 4 of this EP application.

In addition to the ERA, a site-specific dust management plan (DMP) has been completed as required by the criteria listed under the EA's guidance on gov.uk 'Emissions management plan for dust'. The DMP is enclosed in Section 7 of this application.

4.0 Conclusion

The overall conclusion from the studies undertaken as part of the application is that there is unlikely to be a significant environmental impact as a result of the proposed waste recovery operations at Elton 2 Quarry.

IV is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with the company's environmental policy and management system.

It is therefore considered that the permit application should be issued as detailed above.

APPENDIX A

Enhanced Pre-application Advice

Maggie Dutton

Our Ref: EA/EPR/HB3206MC/A001
Date: 02 October 2019

Elton 2 Quarry
Warmington
Peterborough
PE8 6SN

Dear Madam

Pre application checks – Basic service

I am pleased to provide you with your basic level of pre application advice for Ingrebourne Valley Limited as requested.

As part of this service we have provided you with the following information:

Application Reference(s) number(s)	EA/EPR/HB3206MC/A001
Habitats screening	No screening undertaken due to application type
Baseline fee required	The charge for a deposit for recovery activity will be comprised of the following: - Waste recovery plan or variation or revision of a waste recovery plan charge of £1,231.00 (reference 1.19.1); - Desposit of waste for recovery charge of £9,207.00 (reference 1.17.9). The charge for the proposed treatment of non-hazardous waste (subject to there being no appropriate standard rules for this activity): - Physical treatment of non-hazardous waste charge of £7,930.00 (reference 1.16.13). The charge for a Mining Waste Facility will depend on the facility you apply for but the list of all charges can be found in table 1.11 of our charging scheme. As an example:

	- An Inert mining waste operation would be charge at £2,767.00 (reference 1.11.2). Our full charging scheme can be found via the following link: https://www.gov.uk/government/publications/environmental-permitting-charging-scheme-2019.
Forms required to be submitted	You will need to submit the following forms: - A1 - B2 - B4 (waste operations - B5 (mining waste operation) - B6 (if a water discharge regulated facility is required) - F1 These forms can be found via the following link: https://www.gov.uk/government/collections/environmental-permit-application-forms-for-a-new-bespoke-permit.
Additional documents required	You will need to submit the following information with all of your applications: - summary of your Environmental Management system; - non-technical summer of the activity; - site plan; - a site specific risk assessment; - a site condition report. You will need to submit the following for your Deposit for Recovery application: - evidence of technical competency; - Environmental Setting and Site Design (ESSD) report; - a Waste Recovery Plan You will need to submit the following information with your mining waste operation application: - Waste Management Plan; - Estimated expenditure plan (Category A facility only); - External Emergency Plan (Category A facility only).
Additional information	**Pre-application meeting: permit applications for Ingrebourne Valley Limited Elton 2 Restoration** (completed 30/05/2019 between 13:00 and 15:00). **Attendees:** Environment Agency (hereafter EA):

	• Guy Price (GP) • Roland Evans (RE) • Greg Williams (GW) • Kim Maynard (KM) Ingrebourne Valley (hereafter IV): • James Sutton (JS) • Maria Anton-Garcia (M A-G) SLR: • Geoff Keenan (GK) • Maggie Dutton (MD) **What are the key priorities for this type of facility:** Advice sought from EA 1. Confirmation of the planned approach to demonstrate that the proposal is recovery, prior to submission of a Waste Recovery Plan to EA for formal approval; 2. Whether the planned approach to demonstrate that the proposal is recovery is acceptable (subject to submission of a Waste Recovery Plan to EA for formal approval); 3. Acceptability of the engineering approach described: a) Level of detail required for the HRA; and b) advice on methods accepted by EA to demonstrate stability/integrity of the AGB 4. Application documents and supporting information required for the waste storage and mining waste activities in the processing area; 5. Application fees and merits of consolidation in one permit or keeping separate. **Overview:** MD / JS provided an outline of the proposals which include: o A waste recovery application for the restoration of the Elton 2 site post extraction of mineral; o Mining waste settlement lagoons and inert waste crushing plan to be located in the process area; and o An abstraction licence for mineral washing. **Recovery Permit:** There was a group discussion of evidence required to demonstrate recovery by submission of a waste recovery plan. We confirmed that both planning permission and any S106 agreement could be contributory evidence to a specific obligation that would require that the work would go ahead with non-waste if waste was not available also highlighting the evidence requirements for specific obligations

	include in our online guidance. We confirmed it would be preferable for all evidence to be submitted with the waste recovery plan. GP said there is no planned change to DfR guidance so to follow that on gov.uk. Based on the approach being taken here – that there is a specific obligation to complete the work - a waste recovery plan with need to provide evidence of the obligation, plans / cross sections, suitability of waste. For example, if the scheme were to rely on planning permission to demonstrate a specific obligation then not including evidence of this with a waste recovery plan submission may limit our response to "not yet satisfied to agree recovery" with advisory comments confirming what further evidence would need to be provided; in this example the approved planning permission. When discussing the final restoration layer IV confirmed that the growing medium would comprise in-situ materials rather than waste. GP confirmed you can add his name when submitting the plan so the permitting officer assessing the plan can discuss the application. **Site setting and design:** JS discussed hydrogeological setting, main point was that upstream / downstream groundwater boreholes will be difficult to determine due to surrounding water bodies. Upstream / downstream may change depending on water levels surrounding site. Six groundwater monitoring boreholes have been installed, which is above the minimum requirement of one up two down. However, we noted that given the size of the site (borehole spacings several hundred metres) and sensitivity, there may be merit to installing additional boreholes to increase coverage. This will be considered by the applicant prior to submission of the application. Discussed issue of tipping into water and need for a geological barrier. We can authorise the placement of waste into water as a recovery activity where the applicant can show an equivalent level of protection to groundwater and surface water receptors, as set out in the technical guidance. Consultant stressed project is recovery and therefore not covered by landfill directive so no regulatory requirement for a barrier however acknowledged that providing one would offer more protection. Base of site has a natural clay layer and will be a suitable barrier.

	Possible to construct sidewalls from clay or other suitable material to prevent lateral migration of pollutants into surrounding watercourses. EA stressed the need for a hydrogeological risk assessment the findings of which would help determine the need for side barriers or not. The HRA should specify whether or not any attenuating layer is required, and the waste acceptance criteria that would be required in the context of the environmental setting. Waste acceptance criteria would also need to ensure only subsoils would be accepted at the site under 17 05 04 and 20 02 02. More stringent waste acceptance criteria may be required where materials are being tipped directly into water. Some discussion on how to CQA the barrier. This needs to be agreed with the area team, but the details will depend on the quality of the materials used to construct the sidewall liner, and whether or not it is constructed by tipping into water. There was a suggestion of using clay from the base of the quarry to form a sidewall barrier though this may not be possible to extract due to the groundwater present in the void space. However a combination of dewatering and over-digging the clay materials at the base to use as the sidewall should at least be considered. The alluvial materials at the surface may not have the quality of the natural clay at the base. **Noise:** Noise was briefly discussed, nearest sensitive receptor 500 – 700m from site. Noise not thought to be an issue though permit will have standard condition to require a noise survey should problems arise. A noise survey has been conducted for the planning application and this could be used to support the assessment that no Noise Impact Assessment is required. **Permitting approach:** Confirmed that timing for inert recovery operations could be up 6 – 12 months. Discussion of pros / cons to include all activities in one permit. Given that quarrying will start much sooner than restoration it may be sensible to apply for the water abstraction and mining waste first and then apply for the recovery permit at a later date.

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to a full technical check during duly making and determination, and additional information may be required based on your detailed submission and site specific requirements.

When you're ready to submit your application please quote the above reference number.

Your completed application can be sent via email to psc-waterquality@environment-agency.gov.uk or psc@environment-agency.gov.uk.

Or by post to
Permitting Support Centre
Quadrant 2
99 Parkway Avenue
Sheffield
S9 4WF

A complete application must contain the following information;

Declaration	Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.
Site Plan	Site plan must be clearly marked with the full site boundary
Payment	Please note your application will not be processed until we receive the full payment.

If you decide you would prefer our enhanced service (this service requires a fee) please visit GOV.UK where you can complete an online referral form.

We look forward to working with you on this project.

If you have any questions please find my contact details below.

Yours sincerely,
Guy Price
guy.price@environment-agency.gov.uk

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